

**BEFORE THE STATE OF NEW JERSEY
OFFICE OF ADMINISTRATIVE LAW
BOARD OF PUBLIC UTILITIES**

**I/M/O THE PETITION OF PUBLIC)
SERVICE ELECTRIC AND GAS COMPANY)
FOR APPROVAL OF AN INCREASE IN GAS)
RATES, DEPRECIATION RATES FOR GAS)
PROPERTY, AND FOR CHANGES IN THE)
TARIFF FOR GAS SERVICE, B.P.U.N.J. NO. 13,)
GAS PURSUANT TO N.J.S.A. 48:2-18, 48:2-21)
AND 48:2-21.1)**

**BPU DKT. NO. GR05100845
OAL DKT. NO. PUC-1747-06**

**DIRECT TESTIMONY OF RICHARD W. LELASH
ON BEHALF OF THE
NEW JERSEY DIVISION OF THE RATEPAYER ADVOCATE**

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PUBLIC SERVICE ELECTRIC & GAS COMPANY

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TESTIMONY OF RICHARD W. LELASH

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1 I. STATEMENT OF QUALIFICATIONS

2
3 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS FOR THE
4 RECORD.

5 A. My name is Richard W. LeLash and my business address is 18 Seventy Acre
6 Road, Redding, Connecticut.

7
8 Q. WHAT IS YOUR CURRENT BUSINESS AFFILIATION?

9 A. I am an independent financial and regulatory consultant working on behalf of
10 several state public utility commissions and consumer advocates.

11
12 Q. PRIOR TO YOUR WORK AS AN INDEPENDENT CONSULTANT, WHAT
13 WAS YOUR BUSINESS AFFILIATION, AND WHAT WAS YOUR
14 REGULATORY EXPERIENCE?

15 A. I was a principal with the Georgetown Consulting Group for twenty years. During
16 my affiliation with Georgetown, and continuing to date, I testified on cost of
17 service, rate of return, and regulatory policy issues in more than 280 regulatory
18 proceedings. These testimonies were presented before the Federal Energy
19 Regulatory Commission and in the following jurisdictions: Alabama, Arizona,
20 Colorado, Delaware, District of Columbia, Georgia, Illinois, Kansas, Maine,

1 Maryland, Minnesota, Missouri, New Jersey, New Mexico, New York, Ohio,
2 Oklahoma, Pennsylvania, Rhode Island, U.S. Virgin Islands, and Vermont.
3

4 Q. MR. LELASH, WHAT IS YOUR EDUCATIONAL BACKGROUND?

5 A. I graduated in 1967 from the Wharton School with a BS in Economics and in 1969
6 from the Wharton Graduate School with an MBA.
7

8 Q. DURING THE COURSE OF YOUR REGULATORY WORK, WHAT HAS
9 BEEN YOUR EXPERIENCE WITH GAS POLICY AND PROCUREMENT?

10 A. Since 1980, I have worked extensively on gas policy and procurement issues. In
11 my Appendix there is a listing of the recent cases in which I have sponsored
12 testimony. In addition to these cases, I have reviewed and analyzed many other
13 gas policy filings which were resolved through stipulation. Among other issues,
14 my testimonies have involved gas service unbundling, physical and economic
15 bypass, gas supply incentives, gas plant remediation costs, gas price hedging,
16 demand and capacity planning, gas storage options, gas price forecasting, and least
17 cost gas standards. In addressing these issues, I have analyzed gas regulatory
18 filings involving about 30 different local distribution companies ("LDCs").
19

1 Q. WHAT HAS BEEN YOUR EXPERIENCE WITH RESPECT TO THE GAS
2 OPERATIONS OF PUBLIC SERVICE ELECTRIC & GAS COMPANY
3 (“PSE&G” OR “COMPANY”)?

4 A. During the past several years, I have presented testimony in PSE&G proceedings
5 involving its Gas Unbundling, Capacity Contract Transfer, annual BGSS gas cost
6 filings, and most recently, its request for authorization for its merger with Exelon
7 Corporation.

1 II. SCOPE AND PURPOSE OF TESTIMONY

2
3 Q. WOULD YOU PLEASE STATE THE SCOPE AND PURPOSE OF YOUR
4 TESTIMONY IN THIS PROCEEDING?

5 A. I was hired by the New Jersey Division of the Ratepayer Advocate (“Ratepayer
6 Advocate”) to review and evaluate gas policy issues associated with the
7 Company’s Base Rate Filing. The purpose of my testimony is to present findings
8 and recommendations to the Administrative Law Judge (“ALJ”) and the New
9 Jersey Board of Public Utilities (“BPU” or “Board”).

10
11 Q. IN PERFORMING YOUR REVIEW AND ANALYSIS, WHAT DATA
12 SOURCES DID YOU UTILIZE?

13 A. My review and analysis encompassed data from the Company’s filing, responses
14 to discovery requests, and informal discovery meetings. I also utilized
15 information from PSE&G’s previous proceedings and general data concerning its
16 gas operations.

17
18 Q. WAS THIS TESTIMONY PREPARED BY YOU OR BY OTHERS UNDER
19 YOUR DIRECTION AND SUPERVISION?

20 A. This testimony was prepared by me.

1 III. GAS POLICY RELATED ISSUES

2
3 Q. WHAT SPECIFIC POLICY ISSUES WILL YOU ADDRESS IN THIS
4 TESTIMONY?

5 A. Based upon my review of the Company's filing, I will address the Company's
6 Fixed Price Gas ("FPG") proposal, its proposed price elasticity adjustment for
7 revenues, and the applicability of any derived revenue requirement in this
8 proceeding were the pending merger with Exelon to be approved.

9
10 - Fixed Price Gas Tariff Considerations

11
12 Q. WOULD YOU PLEASE PROVIDE A BRIEF SUMMARY OF THE
13 COMPANY'S FPG TARIFF PROPOSAL?

14 A. The Company is seeking to initiate an FPG tariff that would address threats by
15 large gas customers to bypass its gas distribution system. The underlying logic of
16 the tariff is to base FPG rates on the customer's estimated bypass economics.
17 Thus, the distribution and maintenance charges will be based on a defined
18 "alternative delivery cost" which will be derived from cost estimates made by the
19 customer and reviewed by PSE&G. The charges will be expressed on a monthly
20 basis over a proposed 20 year term of service.

1 Q. WHAT IS THE COMPANY’S RATIONALE FOR PROPOSING FIXED PRICE
2 GAS SERVICE AT THIS TIME?

3 A. According to the Company’s witness, Gerald Schirra, the FPG service, “is
4 designed primarily as an optional rate for new or existing large customers that
5 have an economically viable alternative to gas delivery by Public Service.”
6 (Schirra Revised Testimony, Exhibit P-8 R-1 at 49). Beyond this statement, the
7 Company provides no other supporting evidence for the implementation of such a
8 tariff at this time. In its response to discovery request RAR-P-24, the Company
9 acknowledged that, “No former customers of PSE&G have bypassed the PSE&G
10 gas distribution system during the past 10 years.” When asked in discovery
11 request RAR-RD-13 to identify potential future bypass customers, the Company
12 responded, “The number of customers that have the potential to switch to Rate
13 FPG is a relatively small number, and would vary from time to time as the
14 customers analyze their bypass costs and alternatives as rates, adjustment charges,
15 and usage volumes change over time.”

16
17 Q. IS THE COMPANY’S PROPOSED FPG TARIFF IN RESPONSE TO ANY
18 PENDING PLANS BY CUSTOMERS TO BYPASS THE COMPANY’S
19 SYSTEM?

1 A. The Company did not identify any specific bypass customers in its discovery
2 responses. However, as disclosed in an e-mail from the Company, Lafarge North
3 America Inc. (“Lafarge”) made a request to the Board, “to separate out the request
4 for this new gas rate FPG from PSE&G’s request for an increase in charges and
5 act on this new rate proposal in a separate proceeding” (Lafarge Letter to Krisi
6 Izzo, March 22, 2006 at 2). It is my understanding that Lafarge has been
7 considering a bypass option for at least two years, but is now seeking to evaluate
8 the FPG and other non-tariff service options.

9 Based on Lafarge’s evaluation of bypass and its alternatives, there is a
10 question of whether other customers might raise the possibility of bypassing
11 PSE&G’s traditional gas service in order to be able to negotiate an FPG rate and
12 thereby avoid the planning and operational problems associated with actual
13 physical bypass.

14
15 Q. AS A GENERAL MATTER, ARE TARIFFS SUCH AS THE FPG TYPICALLY
16 NEEDED TO ADDRESS THE THREAT OF BYPASS?

17 A. To my knowledge, they are not. In cases where customers threaten bypass, the
18 issue is typically addressed on a customer by customer basis through the potential
19 use of special contracts. However, in these cases, any ultimate response is still a
20 cost based rate that ensures non-subsidized service. While it is desirable to retain

1 large customers on the Company's system, any tariff or special contract still
2 should be non-discriminatory and make a reasonable contribution to the utility's
3 cost of service.

4 It should be understood that potential bypass situations are not very
5 common. In addition to high costs for interconnection to an interstate pipeline,
6 there are issues related to interconnection maintenance and safety as well as on-
7 going administrative costs. As a general matter, it has been my experience that
8 while companies often threaten bypass, they seldom are willing to incur the costs
9 and become involved with the operational aspects of a bypass. Permits, rights of
10 way, safety risks, pipeline maintenance, engineering costs, and potential costs
11 associated with existing and prospective pipeline integrity requirements all tend to
12 ultimately limit the actual number of situations where bypass occurs.

13
14 Q. DOESN'T THE COMPANY, AND EVEN LAFARGE, STATE THAT BY
15 PREVENTING BYPASS THE FPG WILL ENSURE CONTINUED
16 CONTRIBUTION TO THE SOCIETAL BENEFITS CHARGE ("SBC")?

17 A. Any alleged contribution is illusionary at best. The FPG tariff is based on the
18 customer's claimed cost to bypass the system, not on any utility cost to provide the
19 service. In addition, the proposed FPG delivery rate is designed to subsume SUT,
20 TEFA, and SBC charges. The effect of this is that the customer's contribution

1 toward system costs is reduced by the FPG and all other customers absorb any
2 deficiencies.

3 One needs only to look at the data provided in Response RAR-RD-16 to
4 see clear evidence of the deficiencies associated with the FPG. In Response RAR-
5 RD-13 the Company stated that RAR-RD-16 contains a listing of customers that
6 would be candidates for FPG service. Using Rate TSG customers as an example
7 shows the effect of netting SBC, TEFA, and SUT against customer revenues as
8 would be done for the FPG. Of the 16 TSG customers listed, six of them do not
9 provide total delivery revenues that are in excess of even their SBC liability.

10 Accordingly, were such customers to receive service under the proposed FPG
11 tariff, their delivery revenues may not even cover their SBC, TEFA, and SUT
12 liabilities. In such cases, it would be other PSE&G customers, and not PSE&G
13 itself, that would ultimately have to pay for such revenue deficiencies.

14
15 Q. ARE THERE ANY OTHER PROBLEMS WITH THE FPG TARIFF AS
16 PROPOSED BY THE COMPANY?

17 A. Yes, there are several. As an initial matter, the measurement of the customer's
18 bypass cost is speculative and subject to numerous interpretations as to what
19 constitutes valid avoided costs. In discovery request RAR-P-19, the Company
20 was asked to show calculations for the FPG service and identify "all of the

1 components that will determine the charges” and provide “detailed definitions to
2 what cost elements comprise each component.” In answer to the request, the
3 Company referenced its response to RAR-P-16, which did not provide detail on
4 the cost components that would comprise the basis for the FPG rate. This is not
5 surprising since the determination of bypass costs is complex and is relatively
6 unique for each bypass situation. Additionally, it is common for estimates of such
7 project costs to materially understate the actual project expenditures. Likewise, it
8 is unclear how such costs as related customer charges, engineering, rights of way,
9 safety requirements, and allocated expenses would be identified and quantified.

10 The Company’s proposed tariff does not contain any explanation of how
11 the net alternative delivery cost is to be determined, nor does it provide any detail
12 on the cost components that will be included in any such determination. Likewise,
13 the Company’s supporting testimony, while describing the alternative cost
14 concept, does not provide sufficient detail in order to evaluate its reasonableness
15 or to provide guidance on what any cost review would involve. This is
16 particularly troublesome with respect to a customer’s cost to maintain the bypass
17 facilities and address safety requirements and interconnection repairs.

18 In the Company’s discussion of the FPG, there is emphasis placed on
19 matching the FPG rates to a customer’s bypass economics. However, this appears
20 to be more of a concept rather than a reality. Bypass economics cannot be

1 accurately measured without the actual construction and operation of the bypass
2 interconnection. As a result, any FPG analysis and the derived rate will be more
3 of a guesstimate than an accurate reflection of bypass economics. Additionally,
4 the Company inherently is assuming that a customer would be economically
5 indifferent to bypass vs. an FPG rate alternative. This does not reflect the reality
6 of the choice. As a general matter, customers do not want to build, own, and
7 operate a bypass system. They do not have the expertise to operate the pipeline
8 and they do not want to be exposed to the associated safety risks. Likewise, they
9 seldom have trained personnel to maintain the bypass interconnection or to repair
10 it in the event of a line break.

11 There also is a problem with the Company's proposed regulatory oversight
12 of the FPG rate. In Mr. Schirra's revised testimony at page 57 he states, "full
13 agreement for delivery service with the specific customer involved, along with the
14 documentation supporting the proposed charge, would be subject to a 30 day
15 review period by Board Staff prior to implementation." This response raises
16 several questions. In its response RAR-P-26 the Company admits that the
17 referenced full agreement for delivery service "has not yet been developed."
18 Likewise, the stated 30 day review period appears to be inadequate for the
19 contemplated review, the Ratepayer Advocate and other affected parties will not
20 apparently have such review rights, and it is unclear whether the Company's

1 submission is subject to Board review and approval and what transpires if the full
2 agreement is not reasonable.

3
4 Q. ARE THERE ANY ALTERNATIVE ACTIONS THAT CAN BE TAKEN BY
5 THE COMPANY TO AVOID BYPASS?

6 A. In its filing the Company did not discuss any such potential actions. In response to
7 Lafarge's potential bypass, the Company stated that it, "has not contacted Transco
8 nor been contacted by Transco in regard to the potential bypass of Lafarge" nor is
9 it "aware of any legal or regulatory barrier to any interstate pipeline accepting a
10 request for a direct connection." Thus, it does not appear that the Company is
11 very proactive with respect to bypass threats, but then its economics would not, at
12 least in the long run, be adversely affected one way or another which could
13 explain its apparent inaction. Perhaps if any reduction to the associated revenue
14 were allocated equally to the Company and ratepayers, the Company's bypass
15 response would be somewhat more vigorous.

16
17 Q. BASED ON THE ISSUES THAT YOU HAVE RAISED, WHAT ACTIONS DO
18 YOU RECOMMEND BE TAKEN BY THE BOARD?

19 A. The Board should ensure that alternative rates for customers threatening bypass
20 and seeking effective subsidization from other tariffed customers are regulatory

1 exceptions rather than routine tariff offerings. The very existence of an FPG tariff
2 will encourage some customers to assert that they have a bypass alternative.
3 Assuming that a customer actually has an economic bypass option and has the
4 expectation of avoiding SUT, TEFA, and SBC charges, there appears to be little
5 reason why such a customer would seek out an FPG alternative that would, at best,
6 mirror the physical bypass economics.

7 In the alternative, the Company should be permitted to negotiate special
8 contract agreements, for what it determines are valid bypass situations, subject to
9 specific Board review and authorization. Such special bypass driven contracts
10 should specifically be required to show that the service will recover relevant utility
11 costs or, stated in the alternative, that the service should be shown to not require
12 subsidization by other utility customers.

13
14 - Gas Price Elasticity and Revenue Adjustment
15

16 Q. IN THE COMPANY'S REVISED TESTIMONY PRESENTED BY ALBERT
17 STELLWAG, IT IS STATED THAT A PRICE ELASTICITY ADJUSTMENT IS
18 AN APPROPRIATE RATE SETTING PROCEDURE "BECAUSE ACTUAL
19 CUSTOMER USAGE DURING THE TIME THE RATES WILL BE IN EFFECT
20 IS EXPECTED TO BE LOWER DUE TO THE HIGH ACTUAL AND

1 FORECASTED GAS COMMODITY PRICES COMPARED TO THE TEST
2 YEAR” (STELLWAG TESTIMONY, EXHIBIT P-3 R-1 AT 23). HAVE YOU
3 REVIEWED THE COMPANY’S CLAIMS ASSOCIATED WITH THE
4 ADJUSTMENT?

5 A. Yes, I have. Mr. Stellwag goes on to state that the Company’s adjustment in the
6 amount of \$9.4 million should be adopted since high gas commodity prices
7 experienced in the 4th quarter of 2005 are expected to continue into the future. In
8 my opinion, and in the opinion of others familiar with the demand and supply
9 factors affecting natural gas prices, it is not possible to predict future gas prices
10 with any certainty.

11 The point is that the relationship between natural gas prices and customer
12 demand has not been well established and the trend and level of future gas prices
13 are unknown. As such, the adjustment proposed by Mr. Stellwag does not fulfill
14 the known and measurable requirement for utility ratemaking based on several
15 considerations. For example, the proposed adjustment does not consider the fact
16 that the Company’s gas price volatility is tempered by storage inventories and gas
17 price hedging activities. In addition, the trend in natural gas prices that was seen
18 during the past year is unlikely to continue in the future.

1 Q. BY WAY OF BACKGROUND, COULD YOU BRIEFLY DESCRIBE THE
2 METHODOLOGY USED BY THE COMPANY TO DEVELOP ITS PROPOSED
3 ADJUSTMENT?

4 A. Mr. Stellwag's estimates are set forth in the supporting workpapers to his
5 Schedule ANS-36 R-1. His methodology utilizes derived elasticities for
6 residential, commercial, and industrial customers and gas commodity prices based
7 on the 2007-2009 NYMEX average. In order to verify its elasticities, the
8 Company had a review of its methodology developed by Itron, Inc. in February
9 2006. The Itron review stated that PSE&G's price elasticities were reasonable and
10 relatively conservative. However, the Itron review did not express an opinion on
11 the merits of the Company's gas price assumptions (Response RAR-RD-2 Itron
12 Review and Estimation of PSE&G Gas Price Elasticities, February 27, 2006).

13 Since the Company has predicated its adjustment on the NYMEX strip
14 prices, it is speculative based on frequent changes in the gas market's supply and
15 demand factors. Natural gas prices have exhibited extreme volatility over the past
16 several years with a variety of factors influencing their level. Oil prices,
17 hurricanes, LNG imports, domestic production, storage levels, industrial and
18 electric generation use are just some of the factors that affect both short and long-
19 term price levels. In such a market environment it is impossible to forecast future
20 gas prices with any certainty. While NYMEX strip prices are indicative of current

1 expectations of future natural gas prices, changes in any of the supply and demand
2 factors can fundamentally alter both the trend and level of the futures market.
3

4 Q. WOULD YOU PROVIDE EXAMPLES OF HOW GAS MARKET PRICES
5 HAVE MOVED DURING THE PAST SEVERAL YEARS?

6 A. Referring to my Schedule 1, one can start with the year 2000 when gas prices were
7 under \$3.00 per Dth at the beginning of the year. By December of that year, the
8 price (as measured at the Henry Hub) had reached \$8.90 per Dth and forecasters
9 were predicting a continuation of such record price levels. However, by June of
10 2001, prices fell below \$4.00 per Dth and remained at that level until September
11 2002. Subsequently, in 2005, gas prices, which were in the \$5.00 to \$6.00 per Dth
12 range during 2004, rose to more than \$13.00 per Dth during the August to
13 December period. Again forecasters were predicting continued record high price
14 levels and there was even mention of \$20.00 per Dth levels in the near future. At
15 present, such forecasts have been dramatically reduced with prices expected in the
16 \$5.00 to \$6.00 per Dth range for the second half of 2006. This price range is
17 similar to those experienced during the comparable periods in both 2003 and 2004.

18 Accordingly, Mr. Stellwag's assertion, that the high gas commodity prices
19 experienced in the 4th quarter of 2005 (which averaged \$12.35 per Dth) were
20 expected to continue into the future, is wrong. Since his elasticity adjustment is

1 predicated on such erroneous expectations, it too is wrong. However, it should be
2 noted that even if natural gas prices had been sustained at a \$12.00 per Dth level
3 for several months, the fact remains that assumptions concerning natural gas price
4 levels over an extended future period are speculative and unreasonable. It is also
5 unclear whether customers' reactions to price increases would continue to invoke
6 conservation once they become acclimated to the higher price levels.

7
8 Q. BASED ON YOUR ANALYSIS, WHAT IS YOUR RECOMMENDATION
9 CONCERNING THE COMPANY'S ELASTICITY ADJUSTMENT?

10 A. Experience has shown over the past five years that no existing price level is
11 indicative of future price levels. Thus, it is probable that Mr. Stellwag's analysis
12 is incorrect, as is his associated \$9.4 million adjustment. Under established
13 regulatory rate setting procedures, the Company's elasticity adjustment is not
14 based on known and definite evidence, and therefore, it should be rejected by the
15 Board.

1 - Proposed Exelon Merger Impact on Gas Rates

2

3 Q. AT THE CURRENT TIME, THE PROPOSED MERGER BETWEEN EXELON

4 AND PUBLIC SERVICE ENTERPRISE GROUP (“PSEG”) HAS YET TO

5 OBTAIN ALL NECESSARY FEDERAL AND STATE APPROVALS.

6 HOWEVER, IF SUCH APPROVALS ARE OBTAINED, HOW WILL THE

7 MERGER AFFECT ANY RATE DETERMINATION MADE IN THIS

8 PROCEEDING?

9 A. The requested merger is predicated on a showing of positive benefit, and thus, if it

10 were approved, the Company’s revenue requirement should decrease. Indeed, in

11 the merger proceeding before this Board, the Petitioners have identified various

12 synergy savings associated with the merger. On the basis of these savings,

13 Petitioners offered to credit \$120 million over three to four years to PSE&G’s

14 electric and gas customers (1/4/06 Transcript, Docket No. EM05020106 at 79-80).

15 Based on calculations presented by the Division of the Ratepayer Advocate, \$16.2

16 million per year should be credited to the gas operations of PSE&G (Ratepayer

17 Advocate Initial Brief, Docket No. EM05020106, Attachment A).

18 It should also be noted that the synergy savings identified in the merger

19 proceeding were based on limited initial estimates and the actual achieved cost

20 savings, were the merger to be approved, might well be in excess of the estimate.

1 Additionally, there might well be incremental cost savings that might be
2 established were the merger to be approved under a settlement agreement.

3
4 Q. HOW WOULD THOSE ISSUES AFFECT THE REVENUE REQUIREMENT
5 DETERMINATION IN THIS CASE?

6 A. With merger approval, the revenue requirement would be lower than that
7 determined by Mr. Henkes in his filed testimony. In addition, there would be
8 serious question as to whether the record in this case, developed on a “business as
9 usual” basis, would constitute adequate evidence for any base rate case increase
10 given the approval of the merger. The merger, if approved, would be a known
11 event, but its potential impact on revenue requirements would not be either known
12 or measurable. Accordingly, if the merger is approved, the Board should reject the
13 Company’s filing in this proceeding and require the Company to not refile a base
14 rate case for at least two years after any merger transition is complete so that rates
15 can be developed based on actual revenue and cost data that reflects on-going
16 merged operations.

17
18 Q. MR. LELASH, DOES THIS CONCLUDE YOUR DIRECT TESTIMONY IN
19 THIS MATTER?

20 A. Yes, it does.

IV. SUPPORTING SCHEDULE

Schedule 1

Public Service Electric & Gas Company
Gas Prices Per Dth - Henry Hub

	<u>2000</u>	<u>2001</u>	<u>2002</u>	<u>2003</u>	<u>2004</u>	<u>2005</u>
January	2.42	8.14	2.26	5.43	6.13	6.15
February	2.66	5.56	2.31	7.73	5.37	6.14
March	2.79	5.16	3.03	5.94	5.39	6.96
April	3.03	5.18	3.43	5.26	5.71	7.16
May	3.58	4.18	3.50	5.81	6.33	6.47
June	4.29	3.72	3.23	5.82	6.27	7.19
July	3.97	3.11	2.99	5.03	5.93	7.63
August	4.42	2.96	3.09	4.99	5.41	9.52
September	5.06	2.20	3.54	4.62	5.15	12.33
October	5.02	2.47	4.12	4.63	6.35	13.69
November	5.52	2.37	4.04	4.47	6.17	10.31
December	8.90	2.42	4.73	6.13	6.58	13.05

SOURCE: PIRA North American Gas Forecast Monthly, May 24, 2006, page 17.

V. APPENDIX: PRIOR R.W. LELASH TESTIMONIES

R. W. LELASH'S REGULATORY TESTIMONIES
(2001 to Present)

232. Rhode Island, Providence and Valley Gas Companies (Docket Nos. 1673 and 1736) Gas Price Mitigation Testimony for the Rhode Island Division of Public Utilities (January, 2001).
 233. Delaware, Delmarva Power & Light Company (Docket No. 00-463F) Gas Price Hedging Testimony for the Delaware Public Service Commission (February, 2001).
 234. Pennsylvania, Philadelphia Gas Works (Docket No. R-00006042) Base Rate and Policy Testimony for the Pennsylvania Office of Consumer Advocate (April, 2001).
 235. Pennsylvania, Philadelphia Gas Works (Docket No. R-00006042) Base Rate and Policy Surrebuttal Testimony for the Pennsylvania Office of Consumer Advocate (May, 2001).
 236. New Jersey, Public Service Electric & Gas Company (Docket No. GM00080564) Capacity Contract Transfer Testimony for the New Jersey Division of the Ratepayer Advocate (June, 2001).
 237. Vermont, Vermont Gas Systems (Docket No. 6495) Rate Stabilization Plan Testimony for the Vermont Department of Public Service (June, 2001).
 238. Pennsylvania, Philadelphia Gas Works (Docket No. R-00016378) Gas Cost Rate Testimony for the Pennsylvania Office of Consumer Advocate (July, 2001).
 239. Pennsylvania, PECO Energy Company (Docket No. R-00016366) Gas Cost Rate Testimony for the Pennsylvania Office of Consumer Advocate (July, 2001).
 240. Pennsylvania, Philadelphia Gas Works (Docket No. R-00016378) Gas Cost Rate Surrebuttal Testimony for the Pennsylvania Office of Consumer Advocate (August, 2001).
 241. Vermont, Vermont Gas Systems (Docket No. 6495) Rate Stabilization Plan Rebuttal Testimony for the Vermont Department of Public Service (August, 2001)
 242. Georgia, Atlanta Gas Light Company (Docket No. 14060-U) Procurement and Capacity Plan Testimony for the Georgia Public Service Commission (August, 2001).
 243. Rhode Island, New England Gas Company (Docket No. 3401) Earnings Sharing and Gas Policy Testimony for the Rhode Island Division of Public Utilities (March, 2002).
 244. Pennsylvania, Philadelphia Gas Works (Docket No. R00017034F002) Extraordinary Rate Relief Testimony for the Pennsylvania Office of Consumer Advocate (March, 2002).
 245. New Jersey, Public Service Electric & Gas Company (Docket No. GR01110773) Remediation Adjustment Clause Testimony for the New Jersey Division of the Ratepayer Advocate (April, 2002).
 246. Rhode Island, New England Gas Company (Docket No. 3401) Earnings Sharing and Gas Policy Surrebuttal Testimony for the Rhode Island Division of Public Utilities (April, 2002).
 247. Pennsylvania, Philadelphia Gas Works (Docket No. R-00027133) Gas Cost Rate Testimony for the Pennsylvania Office of Consumer Advocate (April, 2002).
 248. Pennsylvania, Philadelphia Gas Works (Docket No. R-00017034) Base Rate Testimony for the Pennsylvania Office of Consumer Advocate (May, 2002).
- Appendix

249. Georgia, Atlanta Gas Light Company (Docket No. 15527-U) Lost and Unaccounted For Gas Testimony for the Georgia Public Service Commission (July, 2002).
250. Pennsylvania, PECO Energy Company (Docket No. R-00027391) Gas Procurement and Policy Testimony for the Pennsylvania Office of Consumer Advocate (July, 2002).
251. Georgia, Atlanta Gas Light Company (Docket No. 15527-U) Lost and Unaccounted For Gas Rebuttal Testimony for the Georgia Public Service Commission (August, 2002).
252. Pennsylvania, Philadelphia Gas Works (Docket No. M-00021612) Gas Restructuring Testimony for the Pennsylvania Office of Consumer Advocate (September, 2002).
253. Georgia, EDC Generic Rulemaking (Docket No. 15295-U) Service Quality Standards Testimony for the Georgia Public Service Commission (October, 2002).
254. Georgia, Marketer Generic Rulemaking (Docket No. 15296-U) Service Quality Standards Testimony for the Georgia Public Service Commission (October, 2002).
255. Pennsylvania, Philadelphia Gas Works (Docket No. M-00021612) Gas Restructuring Rebuttal Testimony for the Pennsylvania Office of Consumer Advocate (October, 2002).
256. Pennsylvania, Philadelphia Gas Works (Docket No. M-00021612) Gas Restructuring Surrebuttal Testimony for the Pennsylvania Office of Consumer Advocate (November, 2002).
257. Georgia, EDC Generic Rulemaking (Docket No. 15295-U) Service Quality Standards Rebuttal Testimony for the Georgia Public Service Commission (November, 2002).
258. Georgia, Marketer Generic Rulemaking (Docket No. 15296-U) Service Quality Standards Rebuttal Testimony for the Georgia Public Service Commission (November, 2002).
259. Rhode Island, New England Gas Company (Docket No. 3476) Service Quality Testimony for the Division of Public Utilities (November, 2002).
260. New Jersey, Jersey Central Power and Light Company (Docket No. ER02030173) Recovery of Deferred Remediation Cost Testimony for the New Jersey Division of the Ratepayer Advocate (December, 2002).
261. Rhode Island, New England Gas Company (Docket No. 3476) Service Quality Surrebuttal Testimony for the Division of Public Utilities (February, 2003).
262. Pennsylvania, Philadelphia Gas Works (Docket No. R-00038173) Gas Procurement and Policy Testimony for the Pennsylvania Office of Consumer Advocate (April, 2003).
263. New Jersey, Elizabethtown Gas Company (Docket No. GA02020099) Comments Concerning Affiliate Audit for the New Jersey Division of the Ratepayer Advocate (June, 2003).
264. Maine, Northern Utilities (Docket No. 2002-140) Management Audit and Service Quality Report for the Maine Public Utilities Commission (June, 2003).
265. New Jersey, Public Service Electric & Gas Company (Docket No. GR03050400) Pipeline Refund Allocation Testimony for the New Jersey Division of the Ratepayer Advocate (August, 2003).
266. Ohio, Vectren Energy Delivery of Ohio (Case No. 02-220-GA-GCR) Gas Procurement and Policy Testimony for the Ohio Consumers' Counsel (November, 2003).

267. Delaware, Delmarva Power & Light Company (Docket No. 03-378F) Evaluation of Gas Procurement and Price Hedging Testimony for the Delaware Public Service Commission (February, 2004).
268. Pennsylvania, Philadelphia Gas Works (Docket Nos. R-00049157 and P-00042090) Purchased Gas Cost Testimony for the Pennsylvania Office of Consumer Advocate (May, 2004)
269. Pennsylvania, Philadelphia Gas Works (Docket Nos. R-00049157 and P-00042090) Purchased Gas Cost Rebuttal Testimony for the Pennsylvania Office of Consumer Advocate (May, 2004)
270. Delaware, Chesapeake Utilities Corporation (Docket No. 02-287F) Gas Supply Plan Review for Chesapeake Utilities and the Delaware Public Service Commission (July, 2004).
271. Georgia, Atmos Energy Corporation (Docket No. 18509-U) Procurement and Capacity Plan Testimony for the Georgia Public Service Commission (August, 2004).
272. Georgia, Atlanta Gas Light Company (Docket Nos. 18437-U and 8516-U) Procurement and Capacity Plan Testimony for the Georgia Public Service Commission (August, 2004).
273. New Jersey, NUI Utilities and AGL Resources (Docket No. GM04070721) Terms and Conditions of Merger Testimony for the New Jersey Ratepayer Advocate (September, 2004).
274. Georgia, Atlanta Gas Light Company (Docket No. 18638-U) Business Risk Testimony for the Georgia Public Service Commission (February, 2005).
275. Pennsylvania, Philadelphia Gas Works (Docket No. R-00050264) Purchase Gas Cost Testimony for the Pennsylvania Office of Consumer Advocate (April, 2005).
276. Federal Energy Regulatory Commission, Exelon and Public Service Enterprise Group (Docket No. EC05-43-000) Market Power Testimony by Affidavits for the New Jersey Division of the Ratepayer Advocate (April and May, 2005).
277. Pennsylvania, PECO Energy Company (Docket No. R-00050537) Gas Procurement and Policy Testimony for the Pennsylvania Office of Consumer Advocate (July, 2005).
278. Georgia, Atmos Energy Corporation (Docket No. 20528-U) Gas Supply Plan Testimony for the Georgia Public Service Commission (August, 2005).
279. New Jersey, Public Service Electric & Gas Company and Exelon Corporation (Docket No. EM05050470) Merger Related Testimony for the New Jersey Ratepayer Advocate (November, 2005).
280. New Jersey, Public Service Electric & Gas Company and Exelon Corporation (Docket No. EM05050470) Merger Related Surrebuttal Testimony for the New Jersey Ratepayer Advocate (December, 2005).
281. New Jersey, Pivotal Utilities Holdings (Docket No. GR05040371) Pipeline Replacement Cost Recovery Testimony for the New Jersey Ratepayer Advocate (February, 2006).
282. New Jersey, Public Service Electric & Gas Company (Docket No. GR05050470) Gas Supply Requirements Testimony for the New Jersey Ratepayer Advocate (May, 2006).